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(*pro hac vice pending*)

Attorneys for Defendant Hat World, Inc.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

BRONWYN NAHAS, on Behalf of Herself
and All Others Similarly Situated,

Plaintiff,

v.

HATWORLD, INC.,

Defendant.

Case No.: 2:16-CV-02267-ES-JAD

Hon. Esther Salas, U.S.D.J.

Hon. Joseph A. Dickson, U.S.M.J.

**DEFENDANT HAT WORLD, INC.'S
NOTICE OF MOTION TO DISMISS
PLAINTIFF'S CLASS ACTION
COMPLAINT**

Motion Return Date: July 5, 2016

Oral Argument Requested

To: Stephen T. Sullivan, Jr., Esq.
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COUNSEL:

PLEASE TAKE NOTICE that on July 5, 2016, at 9:00 a.m., or at such other date and time as the Court may direct, Defendant Hat World, Inc. (“Hat World”), through its undersigned counsel, will move before the Honorable Esther Salas, at the Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Court Room MLK 5A, Newark, NJ 07101, for an Order dismissing with prejudice all the claims asserted in Plaintiff’s Class Action Complaint pursuant to Federal Rule of Civil Procedure 12(b)(6).

PLEASE TAKE FURTHER NOTICE that Hat World will rely on the accompanying brief, submitted herewith.

PLEASE TAKE FURTHER NOTICE that a Proposed Order is submitted herewith.

PLEASE TAKE FURTHER NOTICE that Hat World respectfully requests oral argument.

Date: June 7, 2016

Respectfully submitted,

HAT WORLD, INC.

By: /s/ Eric R. Fish
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